

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,
PLAINTIFF,

v.

TIMOTHY CALLAHAN, FRANCIS M.
ROACHE, PAUL MURPHY,
RICHARD WALSH, AND
THE CITY OF BOSTON,
DEFENDANTS.

C.A. NO. 04-11193NG

ASSENTED TO MOTION FOR LEAVE TO EXTEND TIME TO FILE ANSWER

The Defendant, Richard Walsh, by and through his counsel pursuant to F.R.C.P. Rule 6(b)(1) and hereby requests that this Honorable Court grant leave to file the Answer of Defendant Richard Walsh until April 16, 2005. As grounds for this motion, the Defendant states as follows:

1. That prior to filing his responsive pleading with the Court, Defendant Walsh needs additional time to investigate and assemble the voluminous record from the underlying proceedings in order to sufficiently respond to the allegations made by the Plaintiff in his Complaint.

2. It is unlikely that the Plaintiff would be prejudiced in any way by the Court's allowance of Defendant's motion for enlargement of time.

3. Defense counsel has been out of the office due to the death of an immediate family member.

4. This request is both reasonable and necessary in order for the Defendant Walsh to respond to Plaintiff's allegations in his Answer.

5. Plaintiff's counsel and co-defense counsel have assented to this Motion.

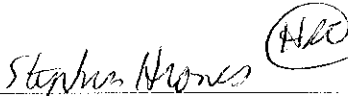
WHEREFORE, the parties respectfully request that this Honorable Court extend the time in which Defendant Walsh must file his Answer in this matter to no later than April 16, 2005.


Assented to by,

Respectfully submitted.

Plaintiff, Shawn Drumgold
By His Attorneys,

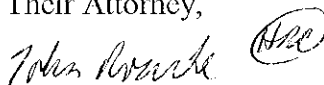
RICHARD WALSH,
By His Attorney,


Stephen Hrones, Esq. BBO #242860
Hrones and Garrity
Lewis Wharf- Bay 232
Boston, MA 02110
(617) 227-4019


Hugh R. Curran, BBO #402057
BONNER KIERNAN TREBACH &
CROCIATA
One Liberty Square - 6th Floor
Boston, MA 02109
(617) 426-3900

**Defendants, Francis M. Roache and
The City of Boston,**

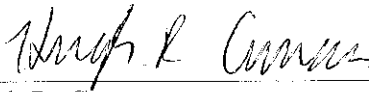
By Their Attorney,


John Roache, BBO #421680
Hogan, Roache & Malone
66 Long Wharf
Boston, MA 02110
(617) 367-0330

Dated: March 2, 2005

**DEFENDANT'S CERTIFICATION
PURSUANT TO LOCAL RULE 7.1(A)(2)**

I hereby certify pursuant to Local Rule 7.1(A)(2) that counsel for the Defendant, Richard Walsh, has conferred with Stephen Hrones, counsel for Plaintiff in the above-entitled action, in a good faith attempt to resolve or narrow the issues raised by the instant motion, and that counsel for the Plaintiff has no opposition to the within motion.



Hugh R. Curran

CERTIFICATE OF SERVICE

2nd This is to certify that a copy of the foregoing document has been mailed, this day of March, 2005, to all counsel of record.

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Hugh R. Curran